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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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: : Index No.:01-1139-JKF  
IN RE W. R. GRACE & CO., :  
: :  
: Debtor : Chapter 11  
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REQUEST FOR SERVICE OF PAPERS  
AND RESERVATION OF RIGHTS

**PLEASE TAKE NOTICE** that the undersigned represents National Union Fire Insurance Company of Pittsburgh, Pa. and its affiliates (together, "National Union"), and pursuant to Rules 2002 and 3017(a) of the Rules of Bankruptcy Procedure and 11 U.S.C. § 1109(b), requests that all notices given or required in this case, and all disclosure statements and plans (whether proposed or approved), and all other papers served in this case, be given to and served upon:

Michael S. Davis, Esq.  
Zeichner Ellman & Krause  
575 Lexington Avenue  
New York, New York 10022  
Fax: (212) 753-0396

**PLEASE TAKE FURTHER NOTICE** that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the rule specified above but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise, which affects the Debtor(s) or the property of the Debtor(s).

**PLEASE TAKE FURTHER NOTICE** that National Union intends that neither this notice nor any later appearance, pleading, claim, or suit shall waive National Union's (1) right to assert arbitration; (2) right to have final orders in noncore matters entered only after de novo review by a District Judge; (3) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (4) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions,

defenses, setoffs, or recoupments to which National Union are or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserve.

Dated: New York, New York  
January 31, 2001

ZEICHNER ELLMAN & KRAUSE LLP  
Attorneys for National Union

By: 

Michael S. Davis  
A Member of the Firm

575 Lexington Avenue  
New York, New York 10022  
(212) 223-0400

CERTIFICATE OF SERVICE

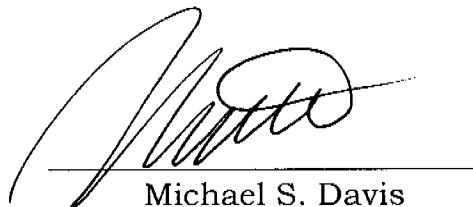
The undersigned hereby certifies that, on January 31, 2002, I served true copies of a REQUEST FOR SERVICE OF PAPERS AND RESERVATION OF RIGHTS upon the following party by first class U. S. mail:

Pachulski Stang Ziehl Young et al  
919 N. Market Street, 16<sup>th</sup> Fl.  
Wilmington, DE 19899-8705

Stroock & Stroock & Lavan LLP  
180 Maiden Lane  
New York, NY 10038

Duane Morris & Heckscher, LLP  
1100 N. Market Street, Suite 1200  
Wilmington, DE 19801-1246

Kirkland & Ellis  
200 E. Randolph Drive  
Chicago, IL 60601



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Michael S. Davis

January 31, 2002